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UNITED STATES OF AMERICA, :

-against- :

ALL RIGHT, TITLE AND INTEREST IN
THE INVENTORY AND OTHER
VALUABLE AND READILY SALABLE
ASSETS OF RAJA JEWELERS,
LOCATED AT 820 NEWARK AVENUE,
JERSEY CITY, NEW JERSEY 07306,
INCLUDING BUT NOT LIMITED TO
JEWELRY, PRECIOUS METALS AND
STONES, MONEY AND OTHER
VALUABLES;

ALL RIGHT, TITLE AND INTEREST IN
THE REAL PROPERTY AND
APPURTENANCES LOCATED AT
95 PERSHING AVENUE, ISELIN,
WOODBURD TOWNSHIP,
NEW JERSEY 08830, WITH ALL
IMPROVEMENTS AND ATTACHMENTS
THEREON;

ALL RIGHT, TITLE AND INTEREST
IN THE INVENTORY AND OTHER
READILY SALABLE ASSETS OF
TANISHQ JEWELS, INC., D/B/A
NIKITA'S INC., 804 NEWARK AVENUE,
JERSEY CITY, NEW JERSEY 07306,
INCLUDING BUT NOT LIMITED TO
JEWELRY, PRECIOUS METALS AND
STONES, MONEY AND OTHER
VALUABLES;

ALL RIGHT, TITLE AND INTEREST IN
THE REAL PROPERTY AND
APPURTENANCES LOCATED AT
638 MILTON AVENUE, LYNDBURST,

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Honorable Jose L. Linares, U.S.D.J.

Civil Action No. 13-1175

**STATEMENT PURSUANT TO RULE
G OF THE SUPPLEMENTAL RULES
FOR CERTAIN ADMIRALTY AND
MARITIME CLAIMS**

NEW JERSEY 07071, WITH ALL
IMPROVEMENTS AND
ATTACHMENTS THEREON;

AND ALL PROPERTY TRACEABLE
THERETO, :

Defendants in rem. :

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VINOD DADLANI, hereinafter called Claimant, being duly sworn, deposes and says:

1. I submit this Statement Pursuant to Rule G of Supplemental Rules for Certain Admiralty and Maritime Claims.

2. I am the fifty percent (50%) owner of Tanishq Jewels, Inc. ("Tanishq"). As such, I am the owner of fifty percent of all Right, Title and Interest in the Inventory and Other Salable Assets of Tanishq Jewels, Inc. d/b/a Nikita's Inc., 804 Newark Avenue, Jersey City, New Jersey 07306, including but not limited to Jewelry, Precious Metals and Stones, Money and other valuables ("the Tanishq Property") seized from Tanishq on February 5, 2013 or any other date.

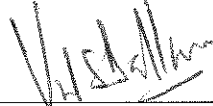
4. The Tanishq Property is subject to seizure or forfeiture pursuant to 18 U.S.C. §981 or any other statute or regulation of the United States. There was not and is not now any probable cause for the seizure of the Tanishq Property. Further, the Tanishq Property was not obtained with the proceeds of any illegal activity and neither I nor anyone else under my supervision or control has used the Tanishq Property to facilitate any illegal activity. Finally, forfeiture of the Tanishq Property would be grossly disproportionate to any alleged illicit activity and would be barred under the Excessive Fines Clause of the Eighth Amendment to the Constitution.

5. This statement and claim is made in good faith and is not frivolous.

6. This statement and claim has been made within the time prescribed by law.


7. This statement and claim is true and correct and made under penalty of perjury.

WHEREFORE, Claimant herein demands the immediate release of the Tanishq Property from seizure.



Vinod Dadlani

Sworn and subscribed to
before me this 3rd day of ^{June} ~~May~~ 13, 2013.


NOTARY PUBLIC
ATTORNEY-AT-LAW